IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF MISSISSIPPI SOUTHERN DIVISION

In re:

888888 Case No. 14-51667-KMS Mississippi Phosphates Corporation,

Chapter 11

Debtor.

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

PLEASE TAKE NOTICE that the undersigned hereby enter their appearance as attorneys for STUW LLC, as Administrative Agent ("Agent"), and pursuant to Rules 2002, 9007, 9010 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and section 1109(b) of title 11 of the United States Code (the "Bankruptcy Code"), request that copies of any and all notices, pleadings, motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations, orders, or other documents, filed or entered in this proceeding, be transmitted to the parties listed below:

> Robert A. Byrd Byrd & Wiser Attorneys at Law 145 Main Street Biloxi, MS 39530 Telephone: (228) 432-8123

Facsimile: (228) 432-7029 Email: rab@byrdwiser.com Lenard M. Parkins
Karl D. Burrer
HAYNES AND BOONE, LLP
1221 McKinney Street
Suite 2100
Houston, TX 77010

Telephone: (713) 547-2000 Facsimile: (713) 547-2600

Email: <u>lenard.parkins@haynesboone.com</u> Email: <u>karl.burrer@haynesboone.com</u>

PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the Bankruptcy Rules and the Bankruptcy Code provisions specified above, but also includes all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, electronically, or otherwise, that: affect or seek to affect in any way the rights or interests of Agent, or any other party-in-interest in this proceeding; or require or prohibit, or seek to require or prohibit, any act, delivery of any property, payment or other conduct by Agent or any other party-in-interest.

PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the Bankruptcy Rules and the bankruptcy Code provisions specified above, but also includes all orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand-delivery, telephone, facsimile transmission, electronically, or otherwise, that: affect or seek to affect in any way the rights or interests of Agent, or any other party-in-interest in this proceeding; or require or prohibit, or seek

Case 14-51667-KMS Doc 10 Filed 10/27/14 Entered 10/27/14 18:25:26 Desc Main

Document Page 3 of 6

to require or prohibit, any act, delivery of any property, payment or other conduct by Agent or

any other party-in-interest.

PLEASE TAKE FURTHER NOTICE that the foregoing simply constitutes a demand

and request for service and does not constitute consent to the jurisdiction of the Bankruptcy

Court.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any

prior or later appearance, pleading, claim, or suit shall waive any right of Agent to (a) have final

orders in non-core matters entered only after de novo review by a District Court judge, (b) trial

by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to

this proceeding, (c) have the District Court withdraw the reference in any matter subject to

mandatory or discretionary withdrawal, or (d) any other rights, claims, actions, defenses, setoffs

or recoupments, under agreements, in law, in equity, or otherwise, all of which rights, claims,

actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: October 27, 2014

By: /s/ Robert A. Byrd

Robert A. Byrd (MS Bar No. 7651)

Byrd & Wiser

Attorneys at Law

145 Main Street

Biloxi, MS 39530

Telephone: (228) 432-8123

Facsimile: (228) 432-7029

Email: rab@byrdwiser.com

3

/s/ Lenard M. Parkins

Lenard M. Parkins (pro hac vice pending) Karl D. Burrer (pro hac vice pending) HAYNES AND BOONE, LLP 1221 McKinney Street Suite 2100

Houston, TX 77010 Telephone: (713) 547-2000 Facsimile: (713) 547-2600

Email: lenard.parkins@haynesboone.com
Email: karl.burrer@haynesboone.com

ATTORNEYS FOR STUW LLC, AS ADMINISTRATIVE AGENT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 27th day of October, 2014, I caused a true and correct copy of the foregoing document to be served via U.S. first-class mail, postage prepaid and properly addressed, on each of the parties on the attached Service List and by ECF notification, using the CM/ECF system, on all registered ECF users appearing in the case.

/s/ Robert A. Byrd

Robert A. Byrd

SERVICE LIST

Stephen W. Rosenblatt, Esq. Butler Snow LLP P. O. Box 6010 Ridgeland, MS 39158-6010

Mississippi Phosphates Corporation 601 Industrial Road Pascagoula, MS 39581

Douglas S. Draper Heller, Draper, Patrick, Horn & Dabney, LLC 650 Poydras Street, Suite 2500 New Orleans, LA 70130

H. Slayton Dabney, Jr. Heller, Draper, Patrick, Horn & Dabney, LLC 650 Poydras Street, Suite 2500 New Orleans, LA 70130

Office of the United States Trustee 501 East Court Street Suite 6-430 Jackson, MS 39201